

## UNITED STATES DISTRICT COURT

Middle District of Pa.Juan Perez Cuevas  
Petitioner,

-v-

Pike County Jail

Respondent.

x

## PETITION

FILED  
SCRANTON

JUN 06 2001

PER KMF  
DEPUTY CLERK

1 : CV01-1008

3. Name and location of court which entered judgment of conviction under which you are presently confined (if applicable).

Immigration Court, Ulster Correctional Facility, 800 Bessemer Rd., Na Panach, NY 124584. Date of judgment of conviction May 15, 19985. Length of sentence Remained Sentencing Judge Joe J. Miller6. Nature of offenses for which you were convicted: Violation to the INS laws Sections 237(a)(2)(B)(i) and 237(a)(A)(iii) of the Immigration and Nationality Act as amended by IIRIRA of 1996.7. Were you sentenced on more than one count of an indictment, or on more than one indictment, in the same court and at the same time: Yes  No 8. Do you have any future sentence to serve after you complete the sentence imposed by the judgment under attack? Yes  No 

A. If so, give name and location of court which imposed sentence to be served in the future:

   
 

B. And give date and length of sentence to be served in future:

   
 C. Have you filed, or do you contemplate filing, any petition attacking the judgment which imposed the sentence to be served in the future? Yes  No 

D. State concisely every ground on which you claim that you are being held unlawfully. Summarize briefly the facts supporting each ground.

A. Ground one: Through my detention in this jail, it has failed to comply with the INS detention standards. Due to my grievances to this end, a hostile position is

I have been physically and verbally abused by some staff. It came to a point that I am being segregated even though the charges that brought the action were dismissed.

### B. Ground two: Deprivation of My Civil Right

Supporting FACTS (tell your story briefly without citing cases or law):

Since early October 2000, I have been requesting copies of my medical record, a letter describing my medical problems, the law library to be updated, title 8 U.S.C. to be brought to the library in type written to be 12, and to be given access to the law library as mandated by the IUS detention standards to meet court deadline. All these grievances were approved but none honored. As a result, I let a 6/26/01 court deadline and am about to loose a 6/31/01 deadline also. Court intervention need A

### C. Ground three: Physical and Psychological Damages.

Supporting FACTS (tell your story briefly without citing cases or law):

Due to the amount of psychological and verbal abuse. On 5/22/01 after been take away in shackles and been falsely accused of breaking the rule I broke down in tears for around 30 or more minutes couldn't breath properly and almost fainted. I not even could talk. The Psychiatrist was call. He said the amount of stress caused the crisis. My wrongful segregati in RCU with a milk and boy diet is worsening my already bad kidneys.

(Please insert additional grounds, if necessary)

Wherefore, petitioner prays that the Court grant petitioner relief to which he/she may be entitled in this proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 5/31/01  
Date

CC:

Pike County Jail  
Delivered by hand

Juan Perez Cervino

Name (Print)

OCAT# 99-09025/A34-204-095

Inmate Identification Number

Signature

Juan Perez Cervino

Address

HCS - Box 8601

Hawley, Pa. 18428

Telephone Number

February 17, 1955

Date of Birth